

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

NGOC THANH PHONG HUYNH,
Petitioner,

V.

ANTONE MONIZ, Superintendent, PATRICIA HYDE, Field Office Director, TODD LYONS, Acting Director U.S. Immigration and Customs Enforcement, KRISTI NOEM, U.S. Secretary of Homeland Security, PAM BONDI, U.S. Attorney General,

Respondents.

Docket No. 1:25-cv-10831-FDS

PETITION FOR WRIT OF HABEAS CORPUS

**PETITIONER’S MOTION TO HAVE PETITIONER
TRANSPORTED TO APRIL 17, 2025 HEARING**

Petitioner Ngoc Thanh Phong Huynh moves pursuant to 28 U.S.C. § 2241(c)(5) for a writ of habeas corpus *ad testificandum* and *ad prosequendum* so that he may be transported to the hearing on April 17, 2025, on his Petition for Habeas Corpus. Such writ is necessary for two reasons. First, counsel may need to consult with Mr. Huynh about decisions regarding his case that may arise at the hearing. Second, counsel may need to consult with Mr. Huynh to clarify factual issues that are relevant to his petition.

WHEREFORE, Petitioner respectfully requests that this Court issue a writ of habeas corpus *ad prosequendum* or *ad testificandum*.

Respectfully submitted,

Date: April 14, 2025

/s/ Jin-Ho King
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Counsel for Petitioner

Rule 7.1 Certification

I, Jin-Ho King, hereby certify that I have conferred with counsel for Respondent last week and attempted in good faith to resolve or narrow the issue. Counsel for the Respondents have not yet taken a position on the motion.

Date: April 14, 2025

/s/Jin-Ho King
Jin-Ho King #679528 (jk@clearsky.legal)